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SITE NAME	Sauget Area 1
DOC ID #	147877
DESCRIPTION OF ITEM(S)	Report of Proceedings
DOCUMENT VARIATION	
PHASE	PRPENF
OPERABLE UNITS	
LOCATION	Box #_1_ Folder #_8_ Subsection_____
PHASE (AR DOCUMENTS ONLY)	<input type="checkbox"/> Remedial <input type="checkbox"/> Removal <input type="checkbox"/> Deletion Docket <input type="checkbox"/> Original <input type="checkbox"/> Update #___ Volume ___ of___
COMMENT(S) Too dark to read	

MONROE & JAMES COMPANY LITIGATION:

PROTECTED MATERIAL: MONROE & JAMES COMPANY LITIGATION
INSURANCE COVERAGE LITIGATION

E.5
7/24/85
147877

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT OF ILLINOIS
ST. CLAIR COUNTY

FILED
JUN 16 1985
Circuit Clerk

PEOPLE OF THE STATE OF ILLINOIS,)
)
Plaintiff.)
)
vs.)
)
PAUL SAUGET, individually, and)
SAUGET & COMPANY, a Delaware)
corporation,)
)
Defendants.)

REPORT OF PROCEEDINGS

Before the HONORABLE JONATHAN ISBELL, Judge

- EXHIBITS -

(July 24, 1985) (no photos)

APPEARANCES:

MR. MARK A. LAROSE, Assistant Attorney General,
On Behalf of the People of the State of Illinois; and
MR. BRUCE CARLSON, Staff Attorney,
On Behalf of the Illinois Environmental
Protection Agency; and
MR. HAROLD G. BAKER, JR., Attorney at Law,
On Behalf of Paul Sauget, individually, and
Sauget & Company, a Delaware corporation.

LINDA S. HOYLMAN, C.S.R.
Official Court Reporter

MSD 0000503

004274

MONSANTO INSURANCE COMPANY LITIGATION:

3

MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

1 PLAINTIFF'S EXHIBIT NO. 2:

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(NOTE: PLAINTIFF'S EXHIBIT NO. 2 HAS BEEN WITHDRAWN
FROM THE COURT FILE AND IS IN THE CARE AND CUSTODY OF MR.
PATRICK M. MCCARTHY OF THE ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY AT THE TIME OF THE PREPARATION OF THIS
REPORT OF PROCEEDINGS.)

HED 0000504

004075

MONSANTO INSURANCE COMPANY LITIGATION:

MAY 25, 1989 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PLAINTIFF'S EXHIBIT NO. 3:

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

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HED 0000505

004276

MONSANTO INSURANCE COMPANY LITIGATION:

December 12, 1979

Division File

P. M. McCarthy

St. Clair County - LPC 163 121 01 - Sauget/Sauget

Note: Refer to attached sketches for details.

MAY 28, 1980 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: MONS
INSURANCE COVERAGE LITIG

On December 6 and 11, 1979, I inspected the subject site to determine compliance with PCB Order # 77-84, dated August 24, 1978. The order directed the placement of final cover over 20% of the site during each six month period. Therefore, as of August 24, 1979, 10% should be final covered. (50% by November 24, 1979.) As of the date of this memo, it is estimated that less than 5% of the site has final cover, and a portion of that is merely stockpiled. This figure is based on the following:

- a) diggings made these two dates
- b) conversation with Paul Sauget on October 9, 1979 at which time he stated that the only final cover hauled in, is in the extreme southern portion of the northern site (stockpiled), and further that he has hauled only "a few loads" in 1979.
- c) personal knowledge of the site and its basically dormant state
- d) two surface and underground fires on the southern site (9-76 and 10-79)

Since the close of the landfill, a coal unloading operation has begun by the Pillsbury Company. On December 11, 1979, Russell Selph, manager of the facility, stated that the recent filling operation on the northern site was done by him. He stated that the filling had ceased and would not resume without a permit. He also stated that the current fill face was approximately the old road on the south end of the fly ash pit, making it the 1966 line. I explained to him that the past landfill operator is under PCB Order to apply final cover and that any operations that alter the land would only complicate matters. He said that his company, Pillsbury, has leased 83 acres of this tract from Eagle Marine Industries, and has no plans to make any major changes.

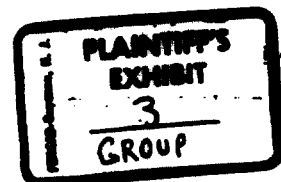
The attached maps indicated the approximate location and depths of borings which determine the amount of cover, and other pertinent data. It should be noted that this summer and entire fall season, has been dry and would have been ideal for final covering operations.

PMH:jlr

cc: Enforcement Services - Stan Parsons (w/attachments)
Southern Region ✓
FOS Manager

HED 0000506

7-24-85
Admitted



KM
004577

MONSANTO INSURANCE COMPANY LITIGATION:

**MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.**

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PLAINTIFF'S EXHIBIT NO. 4:

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

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HED 0000511

004278

MONSANTO INSURANCE COMPANY LITIGATION:

July 23, 1982

MAY 23, 1980 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

Division File

P. M. McCarthy *PM*

LPC 16312101 - St. Clair County - Sauget/Sauget

On July 26 and 27, 1982, Jay Evans and this writer conducted a final cover check at the subject site. The site is divided by the Alton and Southern Railroad tracks, and will be referred to as the Northern site, (north of the A & S) and the Southern Site, (south of the A & S).

On the Northern Site we dug fifteen test holes randomly. Eight of the holes contained no soil before encountering refuse. In most cases, cinders were covering the refuse, except one, in which demolition was covering the refuse. The six, which contained soil as cover, averaged 8.8 inches.

The southern portion of the Northern Site is grown up in weeds and appears dormant. The stockpiled cover material in the extreme southwestern portion of the site remains. It is covered with weeds. The northern portion of the Northern Site consists of the Pillsbury Company coal, coke, and grain operation, plus their permitted demolition site.

The Southern Site has been effectively restricted and no additional random dumping has occurred. No covering has occurred, either. Diggings in December of 1979 showed an average of 5.6" of cover. On July 27, 1982 Jay Evans and this writer tested twenty locations for a total cover of 113", which averages 5.65".

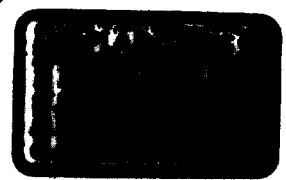
On July 23, 1982, this writer returned to both sites to photograph them. Several photographs were taken on the previous two days, however, camera failure occurred.

PMH:jlr

cc: Southern Region ✓
Paul Van Ness - Enforcement
Vince Moreth

7/24/85
A. Smith
[Signature]

ME0 0000512



-1-

004079



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY INSURANCE COMPANY LITIGATION:

MEMORANDUM

TO: Division File

MAY 25, 1980 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK PRODUCT DOCTRINE. DATE: 7/29/82

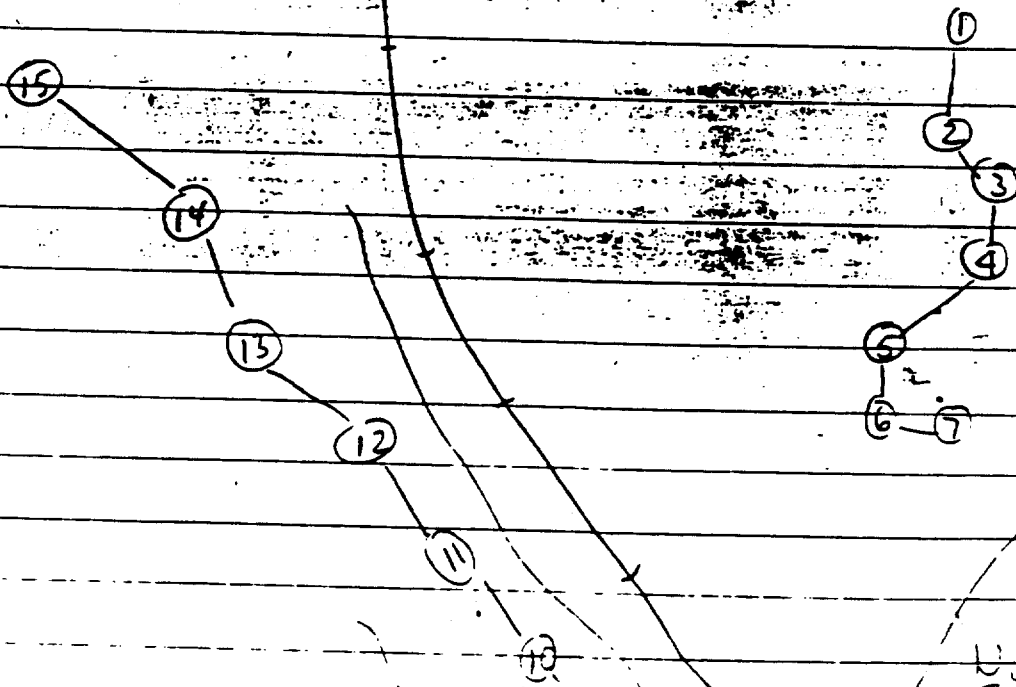
FROM: PM/McCarthy Southern Region

SUBJECT: St. Clair Co. L.P. 163 121 01 Sargent/Sargent

☒ Information only

☐ Response requested

PROTECTED MATERIALS: MONSANTO
INSURANCE COVERAGE LITIGATION



HED 0000513

Workman St.
Franklin Co. Ill.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MONSANTO INSURANCE COMPANY LITIGATION:

MEMORANDUM

TO: Procure FileMAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINEDATE: 7/29/92FROM: PM/McCarthy - Southern Region☒ Information onlySUBJECT: St. Clair Co. LAP 16312101☐ Response requested

- 1) 7" of cinders before encountering refuse - due west of transmission line #5
- 2) 14" of cinders to trash - 30 yds south of #1
- 3) 4' of demolition to trash (glass, metal, asbestos) - 40 yds South of #2
- 4) 27" of cinders to trash (on a cinder pile) - 25 yds southwest of #4
- 5) 5' of cinders to trash - 16 yds southwest of #4
- 6) 4' of cinders to trash - 30 yds " of #5
- 7) 6" of cinders to trash (rags + plastic) - 35 yds SE of #6
- 8) 4' of cinders to trash - ~ 40 yds north of southern entrance
- 9) 8" to trash (soil type & cover)
- 10) 9" to trash - 40 yds North of #9
- 11) 9.5" of soil to trash - 50 yds North of #10
- 12) 7' of soil to trash - 50 yds North of #11
- 13) 21" of cinders to trash - 50 yds North of #12
- 14) 8" of sandy soil to trash - 60 yds N of #13
- 15) 11" of soil + cinders to trash - 50 yds N of #14

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

- survey conducted on 7/26/92
by J Evans & P McCarthy
- all distances approximated
- depth measured w/ yardstick

7/27/92
N. McCarthy

HEO 0000514



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY INSURANCE COMPANY LITIGATION:

MEMORANDUM

TO: Division File

MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE

DATE: 7/29/82

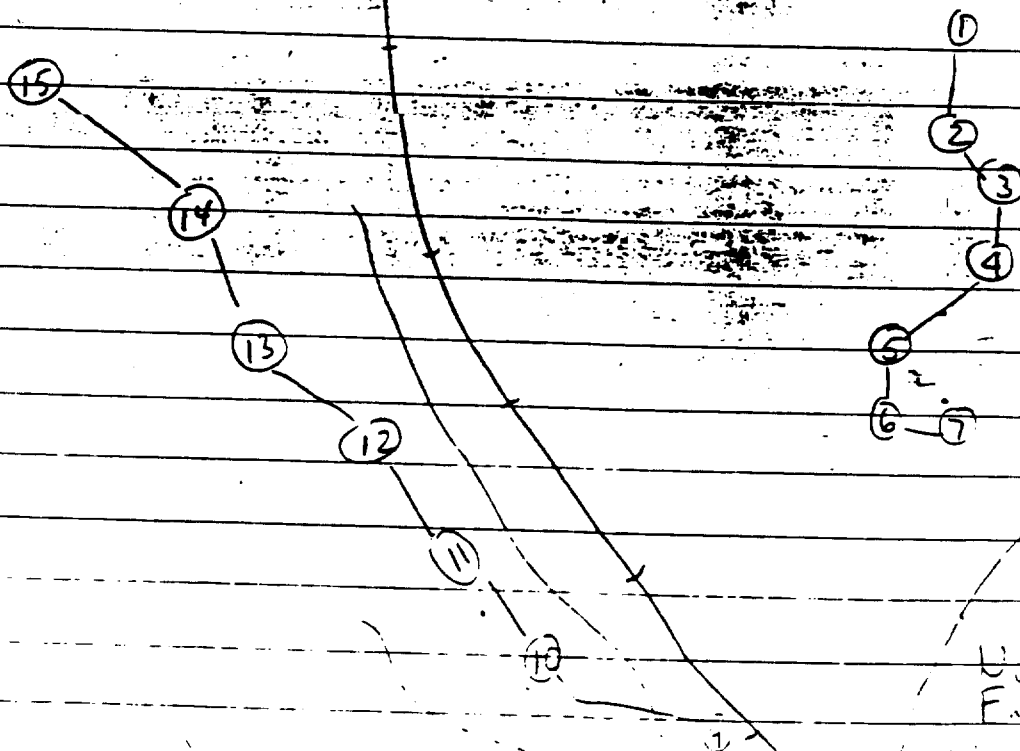
FROM: PM/McCarthy Southern Region

SUBJECT: St. Clair Co. L.P. 16312101 Saugert/Saugert

☒ Information only

☐ Response requested

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION



HED 0000513

Northern St. Clair Co. Ill.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: Division File

DATE: 7/29/02

FROM: P. M. McCarthy

☒ Information only

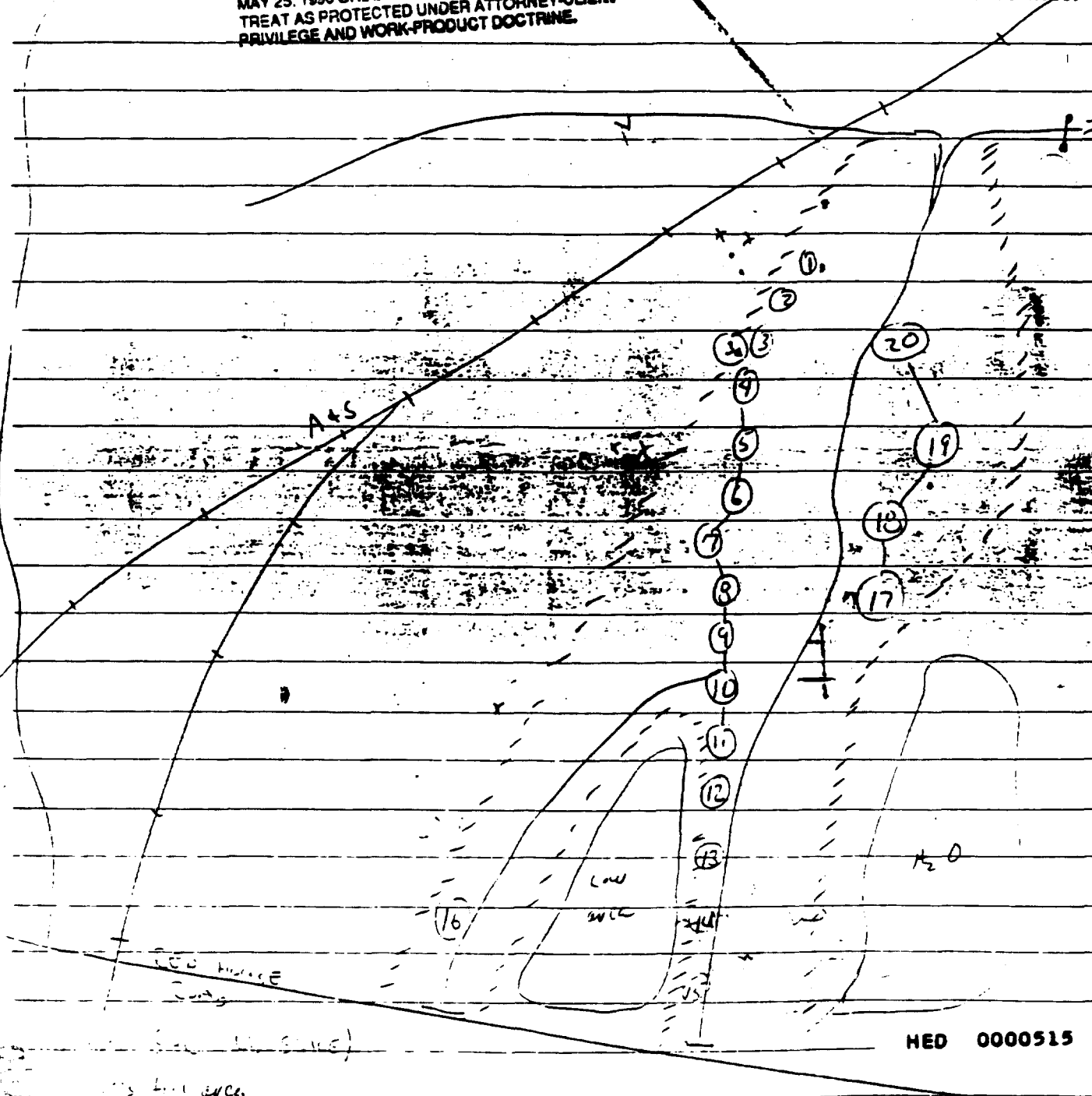
SUBJECT: St. Clair Co. LAC 16312101 Sargeet/Sargeet

☐ Response requested

~~MONSANTO INSURANCE COMPANY LITIGATION~~

MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION



HED 0000515



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MONSANTO INSURANCE COMPANY LITIGATION:

MEMORANDUM

TO: Bureau File

MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE

DATE: 7/29/82

FROM: P.M. McLaughlin

☒ Information only

SUBJECT: St. Clair Co. LPC-16312101 Saugat/Saugat

☐ Response requested

- 1) 10" of sandy soil to trash - 35 yds SW of transmission line
- 2) 4' of sandy soil to trash - 25 yds SW of #1
- 3) 5' of sandy soil to trash - 25 yds SW of #2
- 4) 3' of " " " - 1 yd West of #3
- 5) 8' of " " " - 25 yds SW " #3
- 6) 3' of sandy soil to trash - 35 yds SW " #4
- 7) 6' " " " - 35 yds SW of #5
- 8) 6' of sandy soil to trash - 50 yds SW of #6
- 9) 4' of " " " - 40 yds SW " #7
- 10) 6' of sandy soil to trash - 45 yds SW of #8
- 11) 7' " " " (near w. northern bank of Ho) - 45 yds SW of #9
- 12) 6' " " " - 25 yds SW of #10
- 13) 4' of sandy soil to trash - 40 yds SW of #11
- 14) 9' " " " - 50 yds SW of #12
- 15) 4' of sandy soil to trash - 75 yds SW of #13
- 16) 9' " " " - 120 yds SW of #14 + ~55 yds North of Saugat gate
- 17) 4' of sandy soil to trash - ~100 yds N of Red Horse Road
- 18) 4' " " " " - 30 yds W of on site road - South of second set of transmission lines
- 19) exposed trash - no digging (~10 yds x 10 yds) - 35 yds NE of #17
- 20) 5' of sandy soil to trash - 40 yds E of #18
- 21) 6' " " " - 50 yds N of #19

Southern site

HED 0000516

58083



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY INSURANCE COMPANY LITIGATION:

MEMORANDUM

TO: Division File

MAY 25, 1980 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE. DATE: 7/29/82

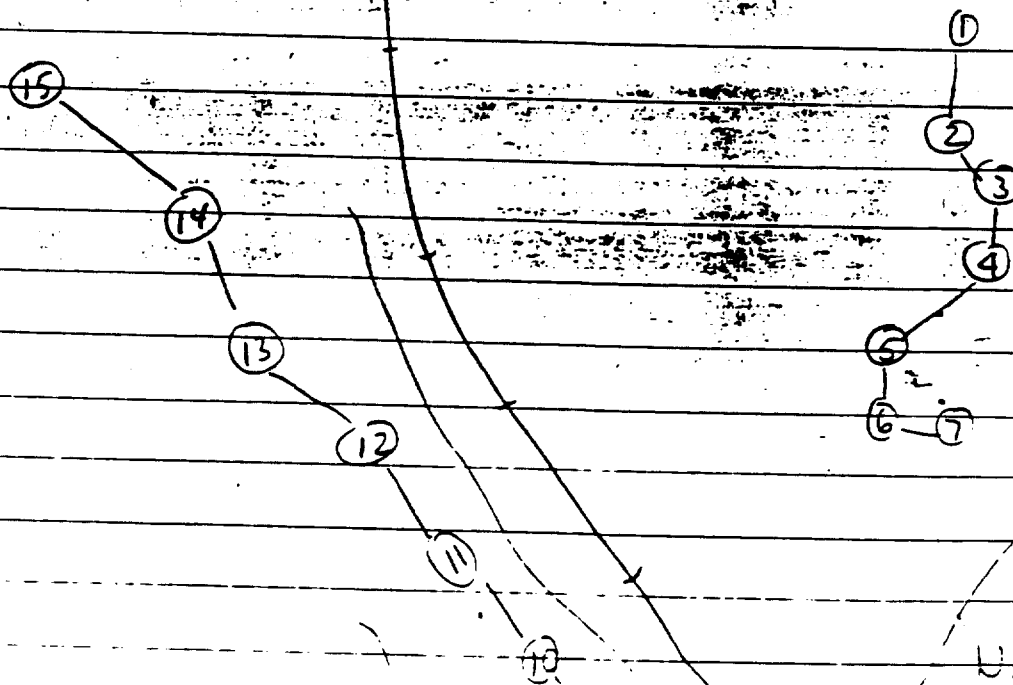
FROM: PM/McCarthy Southern Region

SUBJECT: St. Clair Co. L.P. 163 121 01 Sargent/Sargent

☒ Information only

☐ Response requested

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION



HED 0000513

Wentworth St.
Franklin Co. Ill.

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PLAINTIFF'S EXHIBIT NO. 3A:

MONSANTO INSURANCE COMPANY LITIGATION:MAY 25, 1990 ORDER PROTECTED MATERIAL.
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

HED 0000520

6
X

TOWERS

Probing info: ~

- #1 - 10" cover - 4" soil plus 6" casing
- #2 - 8.5" cover
- #3 - 10" cover
- #4 - 9" cover
- #5 - no probing - no cover (exposed)
- #6 - 11" cover (mixture of soil and casing)
- #7 - no trash at 14" - hit casing at 16"

Method -

Pest hole digger
Picked at all diggings with use
of a yardstick

XX = TRANSMISSION towers as reference point

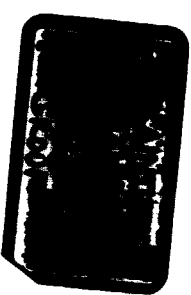
Some obvious SETTING obscured
NOT TO SCALE

ST. CLAIR CO - 16312101
SAUGET / SAUGET

1/21/85

HMS001864

[Handwritten signature]




HEO 0000521

DECEMBER 11, 1979 BY: P.M. MCCARTHY
Probing Information: (by shovel)

- #1 - 4" cover
- #2 - 4" cover
- #3 - 6" "
- #4 - 5" "
- #5 - 9" "
- #6 - 4" "
- #7 - 7" "

One photo taken of digging #7

 = extent of fill area

XX = transmission towers

NOT TO SCALE

ST. CLAIR CO 16312101
SAUGET/SAUGET

HED 0000522

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HMSQ01865

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PLAINTIFF'S EXHIBIT NO. 5:

MONSANTO INSURANCE COMPANY LITIGATION:
MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

HED 0000523

004287

MAY 25, 1996 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTION AGENCY

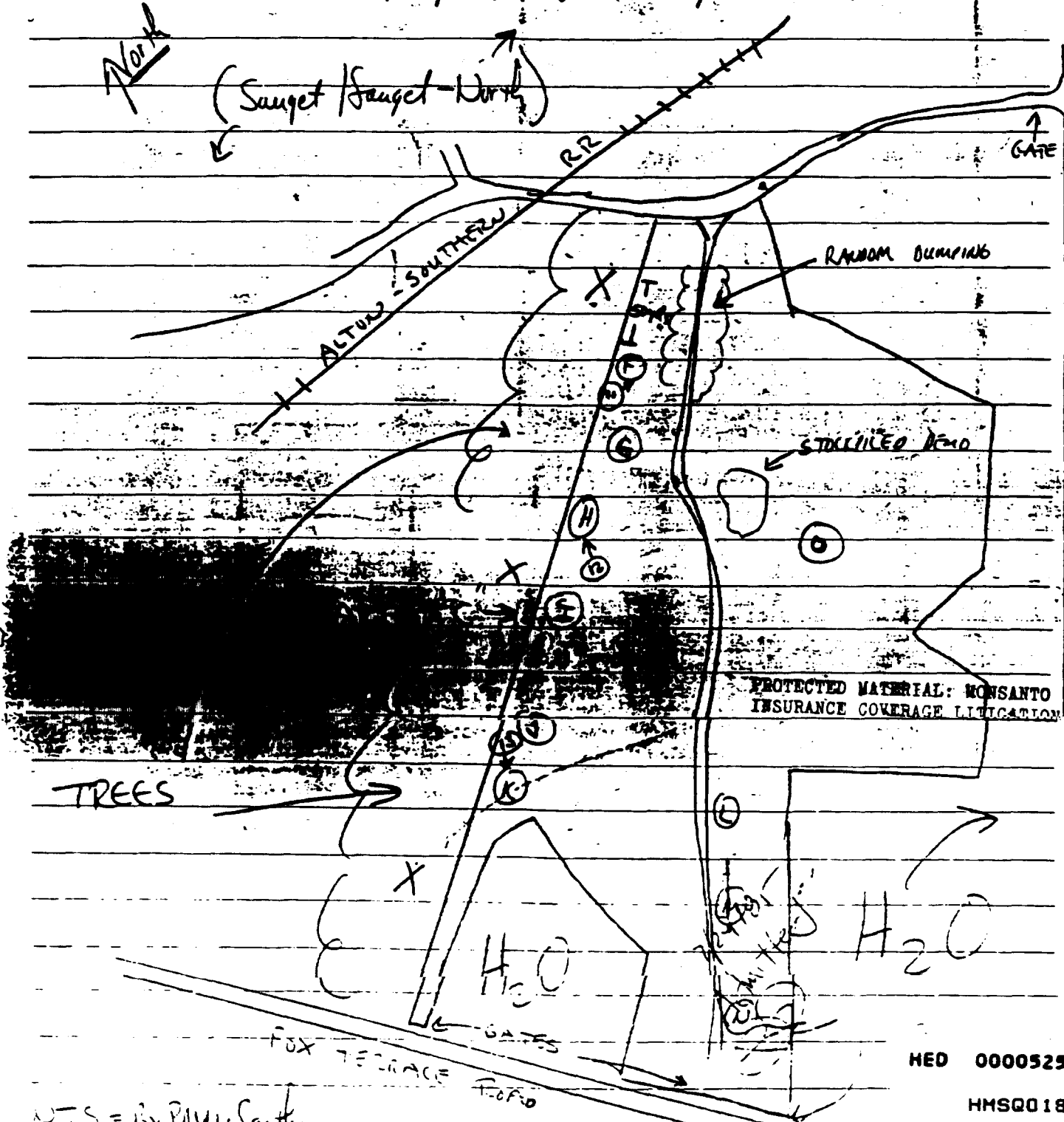
MEMORANDUM

DATE: 2/28/85

FROM: JMM-MCCarthy

☒ Information only

SUBJECT: ST. CLAIR Co. - Sauget / Sauget (South of A/S LA Tracks)

☐ Response requested

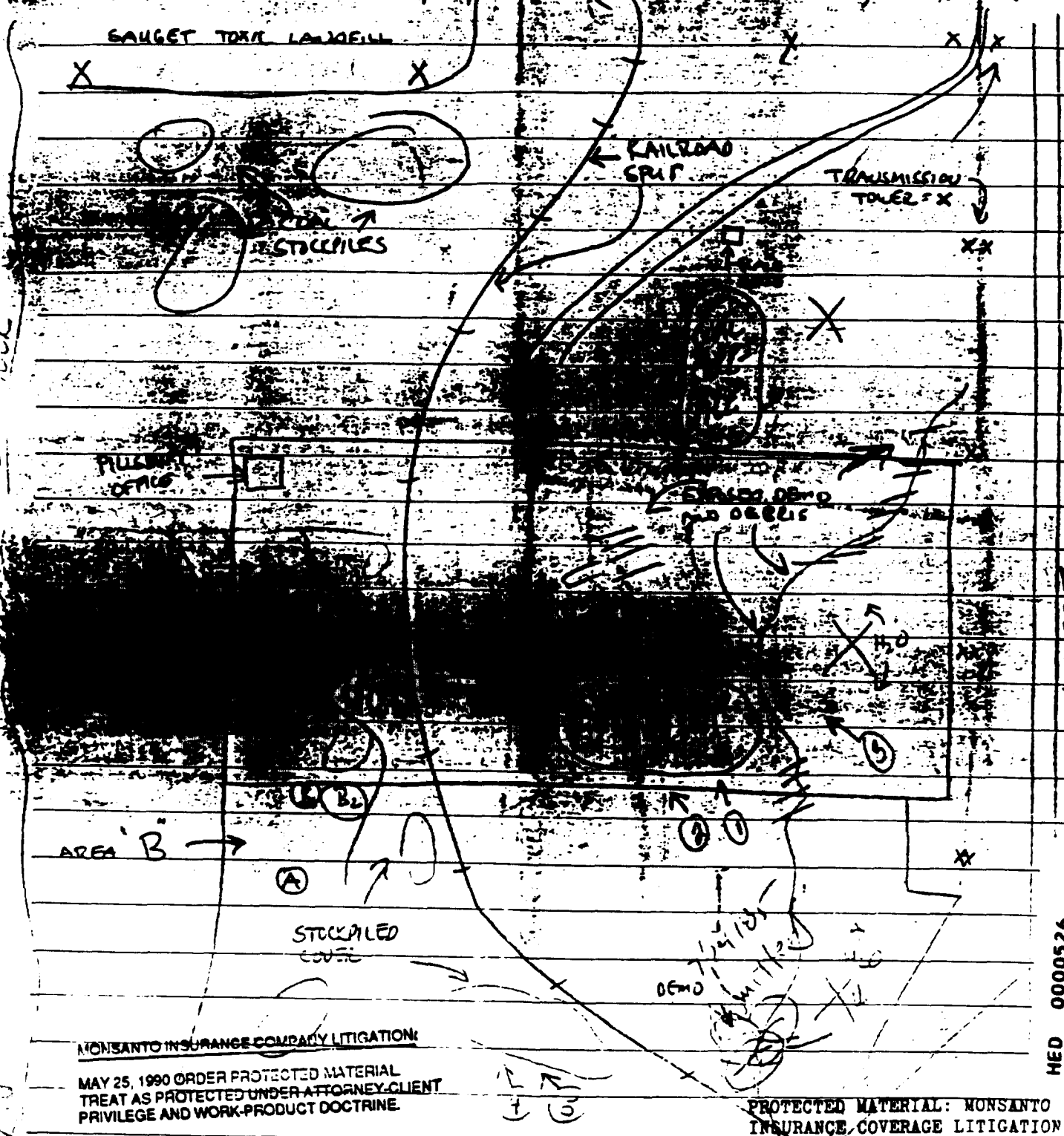
HED 0000525

HMSQ0186

DATE: 3/28/85

SUBJECT: ST. CLAIR Co. Sanguet / Sanguet (North of AHS Tracks)

☒ Information only
☐ Response requested



NONSANTO INSURANCE COMPANY LITIGATION:

MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: NONSANTO
INSURANCE COVERAGE LITIGATION

PLAINTIFF'S EXHIBIT NO. 7:

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MONSANTO INSURANCE COMPANY LITIGATION:

MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

HED 0000534

L P C F C O 5 5 C
(1) (8) (9)

(11) (18)

Region # S

Date 0 7/2 3/8 5

(20) (25)

Letter Sent (Yes or No)

[illegible]

Samples Taken: Yes () No (x) Time: From 08:15 a.m.

Weather 68° Sunny Dry

Ground Water() Surface() Other(), To 10:00 a.m.

Photos Taken: Yes (5) No () Interviewed No one

Inspector P M M
(27) (28) (29)

Previous Inspection 6/10/85

Previous Correspondence 4/3/85

Site Open: Yes () No (X)

OPERATIONAL STATUS: TYPE OF OPERATION:

AUTHORIZATION:

Operating	()	Landfill	(y)
-----------	-----	----------	-----

Storage () E.P.A. Permit ()

Temporarily Closed () Random Dump ()

Salvage	()	Variance	()
---------	-----	----------	-----

Closed Not Covered (X) Other ()

A.C.D. () 21(e) ()

Closed and Covered () Quantity Received Daily(1-6)

Board Order ()

(30) Illegal (5) (X) 5
(31)

IMPROVED

LPC 4 1/79 5,000

SAME

I S or D $\frac{5}{(62)}$

GENERAL REMARKS: Areas A, B and C were walked and inspected - The photos taken on 2/28/85 and 6/10/85 were compared to the conditions observed this date - No significant change was observed - No active operations with regards to covering were taking place - One load of construction and demolition material was observed in the southern part of Area "B" - A name was obtained from several blank checks - A letter will be written to that company. No observable recent random dumping has occurred in Area "C". The area observed on June 10, 1985 in the extreme southern portion of Area "B" and determined to be the responsibility of Placidco - The top of St. Louis has been spread and leveled and the southern slope has been covered.

DIAGRAM:

HED 0000535

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

1/24/85
K. J. [unclear]
[unclear]

EXHIBITS
[unclear]
[unclear]

1 PLAINTIFF'S EXHIBIT NO. 6:
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MONSANTO INSURANCE COMPANY LITIGATION:

MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

HED 0000536



DATE: June 10, 1985
O: Division File
FROM: P. M. McCarthy
SUBJECT: St. Clair Co. Sauget/Sauget
1631210001

On the above date I conducted an inspection of this facility. On May 10, 1985 and May 20, 1985 I visited the site briefly to determine if any covering activity was occurring. On May 20, 1985 it was observed that one area of stockpiled cover had been spread. This is discussed later.

The "south site", (area C) is unchanged with regards to any covering operation. No noticeable random dumping, if any, has occurred since the last inspection. The subject site is covered with green vegetation.

The "north site", (areas A and B) was walked and photographs were taken. The photos that I took on the March 28, 1985 inspection were compared to the conditions that exist this date.

An area in the northern portion of area "A", west of the "Pillsbury Spur", has been spread, however it is uneven and some water was ponding. Also, the cover material contained broken pavement/or rocks, and its suitability is questionable.

Areas of stockpiled cover within "A" and "B" were also observed. Some piles appear to be free of anything unnatural, while others contain high percentages of demolition, (broken pavement, brick, asphalt and rebar).

Some recent stockpiling of soil, demolition material and mixtures thereof (15 to 20 loads) were observed in the area of the extreme southern portion of "Area B". It has been determined that this situation is the responsibility of Patgood, Inc. of St. Louis, MO and is being addressed separately.

PMM:cas

cc: DLPC - Southern Region
cc: Bruce Carlson ✓

MONSANTO INSURANCE COMPANY LITIGATION:

MAY 25, 1990 ORDER PROTECTED MATERIAL
TREAT AS PROTECTED UNDER ATTORNEY-CLIENT
PRIVILEGE AND WORK-PRODUCT DOCTRINE.

PROTECTED MATERIAL: MONSANTO
INSURANCE COVERAGE LITIGATION

HED 0000537

7/24/95
Admitted
(Signature)

